

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DIMAS RODRIGUEZ, on behalf of himself
and all other plaintiffs similarly situated,

Plaintiff,

v.

LEGACY HEALTHCARE FINANCIAL
SERVICES, LLC and LAGRANGE
SKILLED NURSING FACILITY LLC d/b/a
THE GROVE OF LAGRANGE PARK,

Defendants.

Case No. 1:22-cv-04532

Judge: Hon. Robert W. Gettleman

Magistrate Judge: Hon. Susan E. Cox

**PLAINTIFF'S MOTION FOR LEAVE TO FILE EXHIBITS 4, 5 and 7
TO PLAINTIFF'S RESPONSE TO DEFENDANTS' MOTION TO DISMISS
THE FIRST AMENDED COMPLAINT UNDER SEAL**

Plaintiff Dimas Rodriguez (“Rodriguez” or “Plaintiff”) submits the following Motion for leave to file Exhibits 4, 5 and 7 to Plaintiff’s Response to Defendants’ Motion to Dismiss the First Amended Complaint, states as follows:

1. On February 25, 2023, this Court entered an Agreed Confidentiality Order. *See* Doc. #29.
2. The Parties anticipated that confidential material would be disclosed as part of the ongoing investigation of and discovery in this matter.
3. Exhibits 4, 5 and 7 to Plaintiff’s Response to Defendants’ Motion to Dismiss the First Amended Complaint are documents from Legacy Healthcare Financial Services’ production that were labeled “Confidential” pursuant the Confidentiality Order.

4. Plaintiff therefore requests, pursuant to Local Rule 26.2, leave to file under seal copies of Exhibits 4, 5 and 7.

WHEREFORE, Plaintiff requests that this Court enter an order allowing Plaintiff to file under seal Exhibits 4, 5 and 7 to Plaintiff's Response to Defendants' Motion to Dismiss the First Amended Complaint.

Dated: April 21, 2023

Respectfully Submitted,
**Dimas Rodriguez on behalf of himself and all others
similarly situated,**

By: /s/ John Kunze
One of Plaintiff's Attorneys

David Fish, dfish@fishlawfirm.com
Patrick Cowlin, pcowlin@fishlawfirm.com
John Kunze, kunze@fishlawfirm.com
FISH POTTER BOLAÑOS, P.C.
111 E. Wacker Drive, Suite 2300
Chicago, IL 60601
312-861-1800